

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

GREG DABBS

Case Number: 11-847-MJR
(Clerk's Office will provide)

Plaintiff/Petitioner(s)

v.

S.A. GODINEZ, IDOC DIRECTOR, INDIVIDUALLY & OFFICIALLY; BRETT FINLEY, CHIEF AUDITOR, INDIVIDUALLY & OFFICIALLY; CARA SMITH, IDOC CHIEF OF STAFF, INDIVIDUALLY & OFFICIALLY; BRYAN GLECKER ET AL.

Defendant/Respondent(s)

☒ CIVIL RIGHTS COMPLAINT pursuant to 42 U.S.C. §1983 (State Prisoner)
☐ CIVIL RIGHTS COMPLAINT pursuant to 28 U.S.C. §1331 (Federal Prisoner)
☐ CIVIL COMPLAINT pursuant to the Federal Tort Claims Act, 28 U.S.C. §§1346, 2671-2680, or other law

+18 USC § 241

FILED

SEP 21 2011

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

I. JURISDICTION

Plaintiff: GREG DABBS

A. Plaintiff's mailing address, register number, and present place of confinement. R73673, Lawrence Correctional Ctr, 10430 Lawrence Rd Summer, IL 62466

Defendant #1:

B. Defendant S.A. GODINEZ is employed as
(a) (Name of First Defendant)

DIRECTOR OF ILLINOIS DEPARTMENT OF CORRECTIONS
(b) (Position/Title)

with 1301 CONCORDIA COURT
(c) (Employer's Name and Address)

SPRINGFIELD, IL 62794

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☒ Yes ☐ No

If your answer is YES, briefly explain:

He is the Director of Corrections

Defendant #2:

C. Defendant BRETT FINLEY is employed as

(Name of Second Defendant)

IDOC CHIEF AUDITOR

(Position/Title)

with Illinois Dept of Corrections 1301 Concordia Court

(Employer's Name and Address)

Springfield, IL 62794

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain:

Finley is IDOC Chief Auditor

- #3: CARA SMITH, IDOC CHIEF OF STAFF, INDIVIDUALLY & OFFICIALLY - responsible for employee training
 #4: BRYAN GLECKER, FISCAL DEPUTY DIRECTOR, INDIVIDUALLY & OFFICIALLY - responsible for Fiscal + Budget compliance
 #5: ROBERTA FEWS, CHIEF OF PROGRAMS, INDIVIDUALLY & OFFICIALLY, responsible for inmate programs
 #6: MARC HODGE, WARDEN OF LAWRENCE, INDIVIDUALLY & OFFICIALLY, responsible for inmates at Lawrence

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

- #7: MARC BADER, BUSINESS ADMINISTRATOR FOR LAWRENCE, INDIVIDUALLY & OFFICIALLY
 #8: CHERYL DUNN, COMMISSARY STAFF AT LAWRENCE, INDIVIDUALLY & OFFICIALLY
 #9: DALE HOLMAN, COMMISSARY STAFF AT LAWRENCE, INDIVIDUALLY & OFFICIALLY
 #10: BRYAN HOUSE, COMMISSARY STAFF AT LAWRENCE, INDIVIDUALLY & OFFICIALLY
 #11: IDOC 523 FUND, SLUSH FUND USED TO LAUNDER COMMISSARY PROFITS, INDIVIDUALLY & OFFICIALLY
 #12: ILLINOIS CORRECTIONAL INDUSTRIES, PRISON LABOR PRODUCTS, INDIVIDUALLY & OFFICIALLY
 #13: SARA DUNN, LAW LIBRARIAN AT LAWRENCE, INDIVIDUALLY & OFFICIALLY

II. PREVIOUS LAWSUITS

- A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☒ Yes ☐ No
- B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:
Plaintiff(s): GREG DABBS
 v
 SA GONINEZ
 — 11-cv-540

Defendant(s): GREG DABBS
 v
 TAYLOR
 — 11-cv-396
2. Court (if federal court, name of the district; if state court, name of the county): SDIL
3. Docket number: 11-cv-540
 11-cv-396
4. Name of Judge to whom case was assigned: ?
5. Type of case (for example: Was it a habeas corpus or civil rights action?): Habeas Corpus
 Civil Rights 1983
6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Pending
7. Approximate date of filing lawsuit: 2011
8. Approximate date of disposition: Pending

III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☒ Yes ☐ No
- C. If your answer is YES,
1. What steps did you take?
Pursued grievance twice / Enclosed as Plaintiff Exhibit A B C D
 2. What was the result?
ignored
- D. If your answer is NO, explain why not.
- E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? ☐ Yes ☐ No
- F. If your answer is YES,
1. What steps did you take?
 2. What was the result?
- G. If your answer is NO, explain why not.
- H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments of citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

Attached 20 pages of Complaint
 paragraphs 1 through 74 handwritten
 Plaintiff apologizes in advance but he is being denied
 access to the Lawrence Law Library. I have a hard time
 in Penmanship hopefully you can read all of this

Attached EXHIBITS
 PLAINTIFFS EXHIBIT

- A: - Lawrence Commissary receipt dated 1/21/2010
 B: Grievance dated 6-23-10
 C: Grievance OFFICER & WARDEN response dated 10/1/2010
 D: Grievance reply from Director dated 11/9/2010
 E: FOIA request # 110216089 dated 2/22/2011 regarding TV remote
 F: Grievance dated 3-13-2011
 G: Letter to Plaintiff from Illinois Attorney General dated 11/4/2010
 H: Letter to Plaintiff from Legislative Audit Commission dated 3/9/2011
 I: Grievance dated 5/16/11 regarding damage to TV
 return of grievance dated 6/23/11
 J: Letter to office of Inmate Issues dated 6/20/2011
 K: FOIA request # 110209038 dated 2/17/2011
 L: Lawrence commissary Fund Statements for 2009 + 2010
 28 pages of price costs for commissary items
 6 pages of Commissary price list Lawrence inmates pay dated 5/12/2011
 1 Bogus Auditing compliance letter dated 3/10/2009
 2 pages of IBOC directive 02, 85, 105
 1 copy of 730 ILCS 5/3-7-2a 730 ILCS 5/3-4-3(c) 20 Ill Admin Code

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

This box is too small so I attached my complaint to this section with 15 counts against the 13 Defendants.

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 9-18-11
(date)

10930 Lawrence Rd

Street Address

Summer, K 62466

City, State, Zip

Grey Only
Signature of Plaintiff

GREG DABBS

Printed Name

R73673

Prisoner Register Number

~~Signature of Attorney (if any)~~

DATE: 9/9/2017